

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Adonis Latham
Case No. 19-29848 Chapter 13

All Cases: Moving Creditor JPMorgan Chase Bank, N.A. Date Case Filed October 21, 2019

Nature of Relief Sought ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 1/8/2020

Chapter 7: ☐ No-Asset Report filed on _____

☐ No-Asset Report not filed. Date of Creditor's Meeting: _____

1. Collateral

a. ☐ Home

b. ☒ Car 2014 Jeep Wrangler Unlimited, ("VIN") of 1C4HJWEG4EL157223

c. ☐ Other (describe)

2. Balance Owed as of January 8, 2020: \$11,245.25

Total of all other Liens against Collateral: \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the Debtor(s) post-petition:

4. Estimated Value of Collateral (must be supplied in all cases) \$25,825.00, NADA report dated 1/8/2020.

5. Default

a. ☐ Pre-Petition Default

Number of months _____ Amount \$ _____

b. ☒ Post-Petition Default

i. ☒ On direct payments to the moving creditor

Number of months 2 Amount \$ 1,205.14

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of months _____ Amount \$ _____

6. Other Allegations

a. ☒ Lack of Adequate Protection 11 U.S.C. §362(d)(1)

i. ☐ No insurance

ii. ☐ Taxes unpaid Amount \$ _____

iii. ☒ Rapidly depreciating asset

iv. ☐ Other _____

b. ☐ No Equity and Not Necessary for an Effective Reorganization 11 U.S.C. §362(d)(2)

c. ☐ Other "Cause" 11 U.S.C. §362(d)(1)

i. ☐ Bad Faith (describe) _____

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- ii. ☐ Multiple filings
iii. ☐ Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral

- i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☒ No Statement of Intention Filed

Date: January 17, 2020

Respectfully submitted,

/s/ Todd J. Ruchman

Todd J. Ruchman (6271827)

Keith Levy (6279243)

Sarah E. Barngrover (28840-64)

Adam B. Hall (0088234)

Edward H. Cahill (0088985)

Umair M. Malik (6304888)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus OH 43216-5028

614-220-5611; Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Todd J. Ruchman.

Contact email is tjruchman@manleydeas.com

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